

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 21-108 (PAM/TNL)

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	JOINT MOTION TO SET CERTAIN
v.	)	DEADLINES
	)	
1. DEREK MICHAEL CHAUVIN,	)	
2. TOU THAO, and	)	
3. J. ALEXANDER KUENG, and	)	
4. THOMAS KIERNAN LANE	)	
	)	
Defendants.	)	

The United States of America, by and through its attorneys, Charles J. Kovats, Jr., Acting United States Attorney for the District of Minnesota, LeeAnn K. Bell, Assistant United States Attorney, and Samantha Trepel, Special Litigation Counsel for the Civil Rights Division, along with Defendants by and through their attorneys, respectfully move the Court for an Order setting certain deadlines.

The parties have met and conferred regarding various trial-related deadlines. With the understanding that jury summonses have been issued for January 20, 2022, and in order to proceed in an efficient and orderly manner, the parties jointly propose that the Court adopt the following deadlines in its Scheduling Order:

December 20, 2021:	Each party shall make initial disclosure of any experts it intends to call at trial (names and CVs only)
December 30, 2021:	Each party shall file Motions in Limine
January 3, 2022:	Each party shall make complete expert disclosures (written summaries)

January 6, 2022: Each party shall submit its Exhibit List, Witness List, and Special Verdict Form to the Court and file any Trial Brief, Proposed Jury Instructions, and proposed Voir Dire

January 10, 2022: Each party shall file any responses to Motions in Limine

January 17, 2022: Each party shall make disclosures of rebuttal experts (names, CVs and written summaries)

January 17, 2022: Each party shall exchange exhibits with the other parties.

Dated: December 1, 2021

Respectfully submitted,

CHARLES J. KOVATS, JR.  
Acting United States Attorney

KRISTEN CLARKE  
Assistant Attorney General  
Civil Rights Division

/s/ LeeAnn Bell  
BY: LeeAnn K. Bell  
Assistant United States Attorney  
Attorney ID No. 0318334

/s/ Samantha Trepel  
BY: Samantha Trepel  
Special Litigation Counsel  
Attorney ID No. 992377 DC

/s/ Eric Nelson  
Eric J. Nelson  
Attorney for Derek Chauvin  
Attorney No. 308808

/s/ Robert Paule  
Robert M. Paule  
Attorney for Tou Thao  
Attorney No. 203877

/s/ Thomas Plunkett  
Thomas C. Plunkett  
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Attorney No. 260162

/s/ Earl Gray  
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